

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,
Plaintiffs

vs.

FAR EAST ELECTRICAL, INC.,
Defendant

and

SOVEREIGN BANK,
Trustee

C.A. No. 05-11634 RGS

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST FAR EAST ELECTRICAL, INC.**

Now come the Plaintiffs (hereinafter, the "Funds"), and request the Clerk, pursuant to Rule 55(b)(1), Fed.R.Civ.P., to enter default judgment in favor of the Funds and against Defendant Far East Electrical, Inc. (hereinafter "Far East"), holding Far East liable for all unpaid

contributions owed to the Funds, together with interest, statutory liquidated damages, and reasonable attorneys' fees and costs as follows:

A.	Principal owed to the Funds through June, 2005	\$4,876.58
B.	Prejudgment interest on unpaid contributions, as mandated by 29 U.S.C. § 1132(g)(2)(B)	\$8,968.69
C.	Liquidated damages as mandated by 29 U.S.C. §1132(g)(2)(C)(i)	\$378.81
D.	Attorneys' Fees and costs as mandated by §1132(g)(2)(D)	\$1,424.04
TOTAL		\$15,648.12

As grounds therefore, Plaintiffs state that default has been entered against Defendant for failure to answer or otherwise defend as to the Complaint of the Plaintiffs. Plaintiffs' claim is for a sum certain. Finally, Defendant is neither an infant nor an incompetent person.

WHEREFORE, Plaintiffs respectfully request that default judgment be entered against Far East Electrical, Inc.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is
ADMINISTRATOR, ELECTRICAL
WORKERS' HEALTH AND WELFARE
FUND, LOCAL 103, et al,

By their attorneys,

/s/ Gregory A. Geiman

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Dated: February 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Plaintiffs' Motion for Entry of Default Judgment has been served by first class mail upon defendant Far East Electrical, Inc. at 10 Haven Lane, Wayland, MA 01778 this 17th day of February, 2006.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire